

(no subject)

4 messages

Toussaint Cummings <toussaint@fairlawattorney.com>

Tue, Apr 4, 2023 at 5:12 PM

To: Isaac Work <mamane@gmail.com>

Cc: Bridget Obando <bridget@fairlawattorney.com>, Melody Blanco <melody@fairlawattorney.com>

FairLaw Firm	
Filer Name	Toussaint M. Cummings
Court	United States District Court Southern District of Florida
Case Number	1:22-CV-22626
Case Style	Rocky Fernandez v. Selenis Technologies LLC
Document(s) Served	1.Plaintiff's first Request for Production to Defendant 2. Plaintiff's first Request for Admissions to Defendant

Thank you,

Toussaint Cummings, Esq.

FairLaw Firm

135 San Lorenzo Avenue

Suite 770


Coral Gables, FL 33146

Ofc: 305.230.4884

Fax: 305.230.4844

toussaint@fairlawattorney.comwww.fairlawattorney.com

2 attachments

 RFA01 to Selenis (Fernandez).pdf
77K

 RFP01 to Selenis (Fernandez).pdf
101K

Isaac Mamane, Esq. <mamane@gmail.com>

Wed, Apr 5, 2023 at 11:39 AM

To: Toussaint Cummings <toussaint@fairlawattorney.com>

Cc: Bridget Obando <bridget@fairlawattorney.com>, Melody Blanco <melody@fairlawattorney.com>

Toussaint,

I've received Interrogatories, Admissions, and Req for Production in this matter in two emails.

Discovery is premature as the parties have not conducted a 26f conference. Discovery is premature under 26d1. The court has required us to conduct the 26f conference and file a scheduling report in the even that we dont settle the case. It appears that it is the court's intention to wait until after the settlement conference to reduce fees on both sides. Will you agree to withdraw the discovery for right now, and re-served upon the conference?

I haven't forgotten about talking settlement. I've just had some issues on my end with getting you a counter. I hope to move along settlement discussions soon.

Sincerely,

Isaac Mamane, Esq.

Mamane Law, LLC

10800 Biscayne Blvd., Suite 650

North Miami, Florida 33161

Tel: 305 - 773 - 6661

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Toussaint Cummings <toussaint@fairlawattorney.com>

Wed, Apr 5, 2023 at 11:40 AM

To: "Isaac Mamane, Esq." <mamane@gmail.com>

Cc: Bridget Obando <bridget@fairlawattorney.com>, Melody Blanco <melody@fairlawattorney.com>

Hello Isaac,

You are correct about the discovery prior to the 26f conference; that is my oversight. Yes, I will withdraw the discovery so just ignore it for now. Hopefully we can get this case resolved at the conference.

Thank you,

Toussaint Cummings, Esq.

FairLaw Firm

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Suite 770

Coral Gables, FL 33146

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Fax: 305.230.4844

toussaint@fairlawattorney.com
www.fairlawattorney.com

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Toussaint Cummings <toussaint@fairlawattorney.com>
To: "Isaac Mamane, Esq." <mamane@gmail.com>
Cc: Bridget Obando <bridget@fairlawattorney.com>, Melody Blanco <melody@fairlawattorney.com>

Thu, Apr 6, 2023 at 9:1

Good Morning,

You mentioned that the Court required us to conduct a 26f conference and file a scheduling report if the case doesn't settle. Can you please point me to that order? I can't find it on the docket.

Thank you,

Toussaint Cummings, Esq.
FairLaw Firm
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Coral Gables, FL 33146
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Fax: 305.230.4844
toussaint@fairlawattorney.com
www.fairlawattorney.com

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